

Permit No: 146-97-TV

Plant ID: 0564

**Air Pollution Control District
Jefferson County, Ky
7 August 2000**

TITLE V PERMIT SUMMARY

Company: United Parcel Service, Inc.

Plant Location: 911 Grade Lane, Louisville, KY 40213-2617

Date App. Received: 22 April 1977

Date Admin. Complete: 12 May 1997

Date of Draft Permit: 25 June 2000

Date of Proposed Permit: 18 August 2000

District Engineer: Ronald Lee Bohannon

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Plant ID: 564

SIC Code: 4215

NAICS: 49211

AFS: 00564

Introduction:

This permit will be issued pursuant to: (1) District Regulation 2.16, (2) Title 40 of the Code of Federal Regulations Part 70, and (3) Title V of the Clean Air Act Amendments of 1990. Its purpose is to identify and consolidate existing District and Federal air requirements and to provide methods of determining continued compliance with these requirements.

Jefferson County is classified as an attainment area for sulfur dioxide (SO₂), nitrogen oxides (NO_x), carbon monoxide (CO), particulate matter (PM), particulate matter less than 10 microns (PM₁₀), and lead (Pb); unclassifiable for particulate matter less than 2.5 microns (PM_{2.5}); and is a moderate non-attainment area for ozone (O₃).

Application Type/Permit Activity:

- ☒ Initial Issuance
- ☐ Permit Revision
 - ☐ Administrative
 - ☐ Minor
 - ☐ Significant
- ☐ Permit Renewal

Compliance Summary:

- ☒ Compliance certification signed
- ☐ Compliance schedule included
- ☐ Source is out of compliance

I. Source Description

- 1. Class I Area Impacts:** This source is not located in or near a Class I area.
- 2. Product Description:** UPS receives, sorts and distributes packages around the world.
- 3. Overall Process Description:**

Aircraft Ramps, serving as loading and unloading areas
Transportation Vehicle Refueling
Wash Tunnel for package delivery trucks
Waste Storage Building
Flight Simulator Building
Flight Training Building
Hangar Repair Operations
Aircraft Materials Distribution Center
Cargo Container Repair Shop
Kentucky District Automotive Shop
Fuel Farm Storage
Ashbottom Hub for ground package distribution center
South Glycol Farm
Grade Lane Hub as main package distribution center
Air Cargo and Ground Support
North Glycol Farm
Utility Building for emergency power generation

- 4. Site Determination:** There are no other facilities that are contiguous or adjacent and under common control.

5. Emission Unit Summary:

- a. Aircraft Parts Repair and Painting Operations in Hangar Area (U-1)
- b. Reserved for future usage (U-2)
- c. Air Cargo and Ground Support Painting Operations in Support Bldg (U-3)
- d. Jet-A Fuel Loading, Storage and Dispensing Operations (U-4)

This source is exempt from District Regulation 7.22, Standards of Performance for New Volatile Organic Materials Loading Facilities. This is based on the fact that the Jet A fuel used is exempt due to a low vapor pressure of 1 mm Hg at 90 degrees Fahrenheit, which is below the minimum requirements of 1.5 psia or 78 mm Hg.

e. Gasoline and Diesel Fuel Loading, Storage and Dispensing Operations (U-5)

Stage I Control for diesel fueling was installed voluntarily by this source, which was not required by any District Regulation.

Stage I Control for gasoline transfer and gasoline storage.

Stage II Control for dispensing gasoline into vehicles.

f. Emergency Diesel-fueled Backup Power Generators (U-6a)

g. Underground Storage Tank (UST) for diesel fuel for the power generators (U-6b)

6. Fugitive Sources: See Title V Permit**7. Title V Major Source Status by Pollutant:**

Pollutant	Actual Emissions (tpy) 1999 Data	Major Source Status (based on PTE)
CO	9.3	No
NO _x	54.3	Yes*
SO ₂	2.3	No
PM	0.97	No
VOCs	22.7	No
Single HAP (> 1 tpy)		
MTBE	1.4	No**
Total HAPs (VOC and Non-VOC)	8.7	No

* UPS requested a NO_x Emission Cap of 248 TPY for the PTE for this facility, which was granted by the District, after a thorough review process.

** UPS requested an emissions limit of <10 tpy for any single HAP.

The NO_x emissions from this facility are non-major for offset purposes; however, when all combustion sources are included, the PTE is in excess of the 100 ton Major Source Threshold. Since Jefferson County is non-attainment for ozone, the Offset Threshold applies for a major source with the potential increase of 100 TPY. Since this source can not be classified as a major source, the offset requirements are not applicable to this source, based upon actual emissions.

8. Applicable Requirements:

☐ PSD ☒ NSPS ☒ SIP ☐ NSR ☐ NESHAPS
☒ District-Origin ☐ MACT ☐ Other

10. Referenced Federal Regulations in Permit:

40CFR60, Subpart Kb

40CFR60, Subpart A

II. Regulatory Analysis

1. Emission and Operating Caps:

- a. This source has a plant-wide emission cap of 248 TPY for NO_x emissions.
- b. This source has an emission limit of less than ten (10) TPY for HAP emissions.

2. Compliance Status: The source signed and submitted a Title V compliance certification in its permit application.

3. Operational Flexibility: The source did not request to operate under alternative operating scenarios in its Title V Permit Application.

4. Testing Requirements: None at this time.

This company is subject to all applicable requirements of Regulation 6.40 for Stage II Vapor Recovery and Control. Regulation 6.40 stipulates the requirements of compliance with the California Air Resource Board (CARB), which includes annual certification testing.

5. Monitoring, Record Keeping and Reporting Requirements: The source is required to monitor, maintain records of, and report on various operating parameters to demonstrate ongoing compliance with all applicable requirements. Compliance reporting is required semi-annually, except where underlying applicable regulations or permit conditions require more frequent reporting.

6. Off-Permit Documents: None

The District considers an “off-permit document” as a document on which a source’s compliance with given regulation(s) is contingent or which contains regulatory requirement(s), but is only referenced in a source’s Title V Operating Permit. The designation “off-permit document” shall be made at the District’s discretion, and may include, but not be limited to, documents such as Regulation 1.05 VOC compliance plans, PMPs, MOCS; or other documents which are too voluminous to be included in a source’s Title V Operating Permit, as determined by the District.

III. Other Requirements

1. Temporary Facilities: The source did not request to operate any temporary facilities.

2. Short Term Activities: The source did not report any short term activities.

- 3. Compliance Schedule/Progress Reports:** The source has certified compliance with all applicable requirements; therefore, no compliance schedule or progress reports are necessary.
- 4. Emissions Trading:** None.
- 5. Acid Rain Requirements:** The source is not subject to the Acid Rain Program.
- 6. Stratospheric Ozone Protection Requirements:** Title VI of the CAAA regulates ozone depleting substances and requires a phase-out of their use. This rule applies to any facility that manufactures, sells, distributes, or otherwise uses any of the listed chemicals. This source did not indicate the use any of the listed chemicals in its Title V application.

HALON

The canisters for the Halon fire extinguisher system within the aircraft are removed and transported to a contract company for recharging with HCIC, when they are in need of any required service.

- 7. Prevention of Accidental Releases 112(r):** The source does not manufacture, process, use, store, or otherwise handle one or more of the regulated substances listed in 40 CFR 68 Subpart F and Regulation 5.15, Chemical Accident Prevention Provisions, in a quantity in excess of the corresponding specified threshold amount.
- 8. Insignificant Activities:** The following activities, as referenced in the source's Title V Permit Application, have been determined by the District to be insignificant.

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Fuel burning equipment; 4 small boilers and 144 heaters, less than 10 MM Btu/hr capacity each	148	Exempt, Regulation 2.02, section 2.1.1
Various internal combustion engines; emergency fire pumps, power generators	1	Exempt, Regulation 2.02, section 2.2
Lubricant and fuel oil storage, with fluids having a vapor pressure less than 10 mm Hg at 20 deg C	20	Exempt, Regulation 2.02, section 2.3.9.2
Brazing, soldering and welding equipment, used for this type of metal joining operation	1	Exempt, Regulation 2.02, section 2.3.4
Dust collectors and fabric filters, which exhaust inside the building, with less than 1 TPY of PM	5	Exempt, Regulation 2.02, section 2.3.21

INSIGNIFICANT ACTIVITIES		
Description	Quantity	Basis
Non-Halogenated cold solvent part degreasers, equipped with secondary reservoir for solvent.	15	Exempt, Regulation 2.02, section 2.3.22
Moveable fuel tanks with a capacity < 500 gallons, which are able to relocated on the premises.	10	Exempt, Regulation 2.02, section 2.3.23
VOC storage vessels with a capacity < 250 gallons	10	Exempt, Regulation 2.02, section 2.3.24
Fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity. These are day tanks with a tank size = 150 gallons. Tanks are located in the Utility Building.	5	Exempt, Regulation 2.02, section 2.3.25
Fuel storage tanks for emergency generator use, with a throughput < twice the tank capacity. These are day tanks with a tank size = 50 gallons. Tanks for Ashbottom, Fuel Farm and Auxiliary.	3	Exempt, Regulation 2.02, section 2.3.25
Oil-Water Separators (OWS) in use as BMP for stormwater and wastewater permits. OWS are exempt based on the low vapor pressure of Jet-A fuel.	16	Exempt, Regulation 7.36, Section 1

- a. Insignificant Activities are only those activities or processes falling into the general categories defined in District Regulation 2.02, Section 2, and not associated with a specific operation or process for which there is a specific regulation. Equipment associated with a specific operation or process (Emission Unit) shall be listed with the specific process even though there may be no applicable requirements. Information contained in the permit and permit summary shall clearly indicate that those items identified with negligible emissions have no applicable requirements.
- b. Activities identified In District Regulation 2.02, Section 2, may not require a permit and may be insignificant with regard to application disclosure requirements but may still have generally applicable requirements that continue to apply to the source and must be included in the Title V permit.
- *i. Non-halogenated cold solvent parts cleaners shall be operated in compliance with all applicable sections of District Regulations 6.18 and 7.18, including Section 4 of each.

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- ii. No facility, having been designated as an insignificant activity, shall be exempt from any generally applicable requirements which shall include a 20% opacity limit for facilities not otherwise regulated.
- iii. No periodic monitoring shall be required for facilities designated as insignificant activities.